

Dentons' Whistleblowing Line

A comprehensive and tailored offering brought to you by Dentons Europe Compliance Practice

Powered by:  people intouch

Many affirm that they take Compliance seriously. However, do they actually have a whistleblowing system that contributes to the development of an ethical business culture and lives up to the scrutiny of enforcement agencies?

Do they ask crucial questions regarding their whistleblowing system, such as what is the culture of the country the company operates in, the reflecting business culture, and the kind of support employees receive when raising concerns? Are their subsequent investigations thorough? Are policies up to date? Do employees even know how to report?

This is where Dentons' Whistleblowing Suite of Solutions can help. Dentons and People Intouch have formed an alliance to provide a comprehensive solution combining best-in-class legal advice with the right technical solution, at an affordable price. The secure People Intouch powered platform, handled by Dentons' experts will decisively contribute to building an ethical corporate culture and encourage employees and third parties to report misconduct.

Are you ready for the new obligations of the EU Whistleblowing Directive?

- Companies of over 50 employees or municipalities of more than 10,000 inhabitants are required to have effective and efficient reporting channels.
- It protects those that report breaches of EU law, hence including, among others, public procurement, financial services, environment, product and food safety, prevention of money laundering and public health.
- The reporting channel must be secure and confidential (or anonymous) to protect whistleblowers from retaliation.
- It requires diligent follow-up and rapid response: acknowledgment within seven days and feedback within three months.

What will implementing Dentons' Whistleblowing Line do for your business?

- Contribute to build an ethical and compliant business culture in your company, and, send the message that your company is honestly interested in receiving reports of wrongdoing.
- Put your team in the driver's seat of an investigation, and the difficult decisions that may need to be taken, including whether to cooperate with enforcement agencies.
- Avoid whistleblowers going directly to media, or the authorities, before you are aware.
- Facilitate the preservation of independence, confidentiality and anonymity.
- Place you ahead of any crisis that can arise when issues are not properly managed.
- Meet the compliance requirements of potential business partners. Help you to attract the best financiers and suppliers, because of your systematic approach to reporting and addressing internal issues.
- Minimize or even exclude corporate and personal liability.
- Optimize your business processes.
- Comply with legal requirements:

The EU Whistleblowing Directive* must be transposed into national law by December 17th, 2021. Mandatory obligations are coming.

Beyond the evolving EU rules, local laws require the implementation of whistleblowing systems that comply with certain requirements.

* EU Directive 2019/1937 of the European Parliament and of the Council of October 23rd, 2019 on the protection of persons who report breaches of Union law.

Our Solution: Dentons' Whistleblowing Line - A comprehensive package to meet your needs

Dentons and People Intouch have formed an alliance to pair the most comprehensive technical solution together with the most complete legal offering to meet our clients' needs.



Legal know-how

- **Set up or upgrade a whistleblowing system** that meets all legal requirements and is in line with best market practices.
- **Manage the whistleblowing hotline**, from receiving the report up until the resolution of the case.
- **Draft or review the policies** and other internal documents concerning the whistleblowing system.
- Conduct all types of **internal investigations**, from local small-scale to complex multijurisdictional investigations.
- Provide **on-going guidance** on how to avoid common pitfalls and preserve the reputation and financial wellbeing of the business.
- Carry out Compliance **reviews and audits** regarding the operation and effectiveness of a whistleblowing system.
- **Train the potential users** of the whistleblowing hotline, as well as those in charge of handling the reports.



Technology

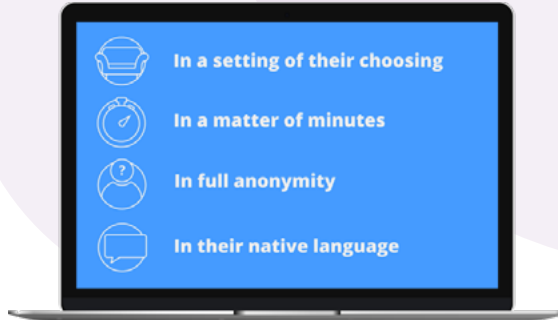
- Provide you with a secure, **easy to use technological platform**.
- **Top European companies** use People Intouch.
- **Preferred pricing for Dentons' clients**.
- **Customizable solution to suit the needs of any business**.
- Unsurpassed coverage. **249 countries/territories/ over 75 languages**.
- **Exceptional technical expertise and unparalleled privacy & information security** assurances (i.e. ISAE3000 Type II and EuroPriSe/GDPR compliant).
- **Implementation and internal support** to ensure your employees know how to use the platform, and why.

A customizable solution

People Intouch integrates web and telephone reporting in a single communication tool, SpeakUp®. It also provides a bespoke Case Management System as an add-on to SpeakUp featuring additional reporting and case handling functionalities.



Case handling with SpeakUp includes basic case management functionalities, allowing easy collaboration with colleagues on a need-to-know basis and insightful overviews.



The bespoke Case Management System creates a complete overview of all compliance reports throughout your organization. SpeakUp® cases are automatically entered into the Case Management System. You also have the option to manually add cases reported via other sources (e.g. emails, direct phone calls, desk visits, confidant reports, etc.).

Reasons to add on a bespoke CMS:

- Insightful statistics (annually, quarterly, etc.)
- Assessment of a case: add risk level, categorize (fraud, theft, bullying, etc.) and specify authorization information (who is allowed to work on this case?)
- Communicate and create tasks or assignments
- Forward cases, redact content or invite external investigators
- View case history
- Log investigation steps and outcomes
- Conclude and evaluate the case, log any actions taken and lessons learned



Why choose Dentons?

- Tailored to your business needs and your Compliance policies.
- Protected by attorney-client privilege.
- Unparalleled global footprint.
- Transparent and competitive pricing.
- Track record of successful implementation of whistleblowing systems and proficiency in conducting investigations.
- Coordinated technical and legal support.
- Advanced technology and maximum security, data stored in the EU (out of reach from US jurisdiction).

An integrated end-to-end process

Kick off: Implementation (or upgrade) of your whistleblower system

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- Advising on the design of the whistleblowing system.
- Ensuring all legal requirements are met for all jurisdictions where you operate
- Drafting the policies and review of other internal regulations concerning whistleblowing
- Training for users of the hotlines well as those in charge of handling the reports

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- Ensuring users' onboarding and technical set up
- Providing technical support and training on use of the platform
- Providing best practices for internal adoption and roll out

Operation, Step 1: Whistleblower's 1st message



- A whistleblower leaves a new message via phone or web in native language and attaches any documents
- The whistleblower can choose to remain anonymous or not and will receive a unique anonymous ID and password to ensure two-way communication with our experts

Step 2: Processing the message(s), managing the alerts, and securely communicating with the whistleblower

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- People Intouch processes the message, which may involve transcription and/or translation into English, as required



- The whistleblower checks status of their report via phone or web using their unique case number, and will respond to the lawyers' question in a safe way

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- People Intouch processes the message, which involves transcription and/or translation into English, as required

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- Dentons lawyers receive the message(s) and manage them within the platform, directing as required internally, analyzing and taking appropriate action
- Dentons will update your team on the complaint and will send regular reports, keeping you on top of the situation

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- Dentons replies to the message(s) and asks for further information from the whistleblower if needed

Insuring system sustainability and compliance: Maintenance, reporting, auditing, training

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- Maintaining the technical solution to ensure optimal operability

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- Regularly audit processes and cases, as well as provide thorough reports
- Providing regular training

Step 3: Guiding you on the most appropriate response

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- Dentons will guide you to take the most appropriate legal actions to investigate and address the relevant cases

Contacts

For more information contact your trusted lawyer at Dentons, or the Dentons Europe Compliance Co-Heads.



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